

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>W.R. Grace &amp; Co., <u>et al.</u>,</b>	)	<b>Case No. 01-01139 (JKF)</b>
	)	<b>(Jointly Administered)</b>
	)	
<b>Debtors.</b>	)	

**Attachments to Memorandum in Support of the Claimants' Motion to Exclude  
Dr. R.J. Lee's Opinion on Cleavage Fragments**

Darrell W. Scott, Esq.  
Burke D. Jackowich, Esq.  
Lukins & Annis, PS  
717 W. Sprague Ave., Suite 1600  
Spokane, WA 99201  
Telephone: (509) 455-9555  
Facsimile: (509) 747-2323  
ADDITIONAL SPECIAL COUNSEL

Edward J. Westbrook, Esq.  
Robert M. Turkewitz, Esq.  
James L. Ward, Esq.  
Robert S. Wood, Esq.  
Richardson, Patrick, Westbrook & Brickman  
1037 Chuck Dawley Blvd., Building A  
Mount Pleasant, SC 29464  
Telephone: (843) 727-6513  
Facsimile: (843) 727-6688  
ZAI CLAIMANTS' SPECIAL COUNSEL

William D. Sullivan, Esq.  
Charles Brown, Esq.  
Eluzufon Auston Reardon Tarlov & Mondell  
300 Delaware Avenue, Suite 1700  
P.O. Box 1630  
Wilmington, DE 19899  
Telephone: (302) 428-3181  
Facsimile: (302) 777-7244  
COUNSEL FOR THE ZONOLITE CLAIMANTS,  
BARBANTI, BUSCH, PREBIL, AND PRICE

Dated: July 7, 2003

## TABLE OF CONTENTS

### Exhibit

- 1 Excerpts from Morton Corn Deposition (May 29, 2003)
- 2 R.J. Lee Report (Apr. 15, 2003)
- 3 Excerpts from OSHA Proposed Asbestos Standard (1992)
- 4 Excerpts from R. J. Lee Deposition (June 6, 2003)
- 5 Ambient Air – Determination of Asbestos Fibers – Direct Transfer Transmission Electron Microscopy Method, Number 10312, International Standards Organization (1995)
- 6 Determination of Cleavage/Asbestiforms, R.J. Lee flow chart (Aug. 31, 2001)
- 7 Ann Wylie, Habit of Asbestiform Amphiboles: Implications for the Analysis of Bulk Samples, Advances in Environmental Measurement Methods for Asbestos, ASTM STP 1342 (M.E. Beard and H.L. Rooks, eds. 2000)
- 8 R.J. Lee, et al., Asbestiform and Nonasbestiform Mineral Growth Habit and Their Relationship to Cancer Studies (Apr. 2003)
- 9 J. C. McDonald, et al., Cohort Study of Mortality of Vermiculite Miners Exposed to Tremolite, British J. of Ind. Med., 43:436-44 (1986)
- 10 J. C. McDonald, et al., Health of Vermiculite Workers Exposed to Trace Amounts of Fibrous Tremolite, British J. of Ind. Med., 45:630-34 (1988)
- 11 Asbestos Strategies, Lessons Learned About Management and the Use of Asbestos, Global Environment & Technology Foundation (Apr. 21, 2003)
- 12 Grace draft response to an inquiry from the Consumer Products Safety Commission (Apr. 24, 1979)
- 13 Memorandum from E. S. Wood to C. E. Brookes, et al. (May 24, 1977)
- 14 Letter from H. A. Eschenbach to A. Harvey, R.T. Vanderbilt Company (May 12, 1983)
- 15 Julie Yang, Chemistry of Vermiculite and Asbestos (Sept. 16, 1983)

- 16 Excerpts from Julie Yang deposition in United States v. W.R. Grace & Co. (Aug. 21, 2002)
- 17 R. J. Lee Group Project Report. Polarized Light Microscopy Worksheet for Asbestos Analysis of Bulk Samples (June 26, 2002)
- 18 Julie Yang, Characterization and Preparation of Respirable Sized Tremolite Fiber and Vermiculite for Animal Studies (Apr. 8, 1976)
- 19 Memorandum from J. W. Wolter to Grace file (Oct. 5, 1976)
- 20 OSHA, Polarized Light Microscopy of Asbestos, Method ID-191 (1992)
- 21 William Longo Affidavit
- 22 W. J. Campbell, et al., Selected Silicate Minerals and Their Asbestiform Varieties, Bureau of Mines Information Circular 8751 (1977)
- 23 R. L. Perkins & B. W. Harvey, Method for the Determination of Asbestos in Bulk Building Materials, EPA/600/R-93/116, Table 2-2 (July 1993)
- 24 Excerpts from Edward Ilgren Deposition (May 22, 2003)
- 25 W. J. Campbell, et al., Relationship of Mineral Habit to Size Characteristics for Tremolite Cleavage Fragments and Fibers, Bureau of Mines Report of Investigations 8367 (1979)
- 26 R. J. Lee, et al., Considerations in the Analysis and Definition of Asbestos Using Electron Microscopy, National Bureau of Standards Special Publication 619 (Mar. 1982)
- 27 Letter from W. R. Grace to OSHA (May 24, 1984)
- 28 R. J. Lee Report in United States v. W. R. Grace & Co. (July 29, 2002)
- 29 EPA Memorandum from Christopher P. Weis to Paul Peronard (May 31, 2002)
- 30 EPA's Response to Comments Received on the Second Supplement to the Export/Screening Plant Administrative Record, United States v. W. R. Grace & Co. Administrative Record Document 2002165
- 31 Order in United States v. W. R. Grace & Co. (Dec. 19, 2002)
- 32 EPA Summary On-Site Audit Report, R.J. Lee Group, Inc. (May 1, 2001)

- 33 EPA Memorandum from Michael B. Cook to Superfund Regional Managers (June 19, 2003)